

REMARKS

It is respectfully submitted that the present rejection utilizes the hindsight knowledge of the present invention in selecting elements which are contended to meet the recitations of the claims and then arranging those selected elements in just the right way to meet the recitations of the claims.

Firstly, the main reference relied upon Fry, which Examiner Chu characterizes as a "convenience device". Actually, what Fry shows is an abrasive disc for an orbital sander! Abrasive discs are of course attachable to a rotatable head of a powered sanding machine in order to be applied against a workpiece to sand it down. This is nothing whatever like a convenience device in terms of either its nature or purpose when construed within the context of the specification and drawings of the present application. In this regard, a person skilled in the art would not look to or consider looking in the field of abrasive discs when solving problems in the field of convenience rolls unless the solution of the present invention was known. Thus, it is respectfully submitted that the rejections based upon Fry have been overcome. Favorable reconsideration is respectfully requested.

However, in a spirit of conciliation, claims 33-37 have been added further defining the material forming the web to distinguish over Fry. Thus, it is respectfully submitted that claims 33-37 are in condition for allowance for this separate and independent reason. Favorable reconsideration is respectfully requested.

Furthermore, Examiner Chu suggests that Fry's abrasive discs are each "folded about a plurality of radially extending fold lines" into a stack. It is true that Fry's discs are folded into a stack. However, they most certainly do not have any "radially extending" fold lines. On the contrary, the only folding that is present in Fry is at the very edges of the discs, where adjacent discs are joined together. This is the fracture point where neighboring discs are separated from each other.

There is a very good reason why Fry's discs do not have any fold lines (whether radially extending or otherwise), other than at their edges. This is because the individual discs are intended to be used flat. The head that they are designed to be attached to on a sanding machine is typically a flat circular plate. If the discs had any fold lines or other form of crease, this would very likely lead to their early disintegration in actual use (as anyone who has any experience of using an orbital sander will know!). A fold or crease in a sanding disc tends to catch against the

workpiece, which then causes the disc to tear. It would go completely against common knowledge of orbital sanding experience to even consider introducing fold lines or any other form of crease into an abrasive disc. Thus, the Examiner's attempt to combine the teaching of Fry with a reference teaching fold lines, such as Sutton, would destroy the operability of the abrasive discs of Fry and would not be considered by a person skilled in the art, except in an attempt to meet the recitations of the claims of the present application. Therefore, it is respectfully submitted that the rejections based upon Fry have been overcome for this separate and independent reason. Favorable reconsideration is respectfully requested.

Additionally, and in a similar manner as Fry, product shown in Sutton is itself also fundamentally different from the present invention in terms of both its nature and purpose. Sutton's product is a filter, not a convenience device. The reason for its preferred circular shape and quadrant storage pattern is clearly to facilitate its intended use: the filter is designed to be unfurled and placed a conical seat in the mouth of a percolator. This is nothing whatsoever like a convenience wipe in terms of either its nature or purpose when construed within the context of the specification and drawings of the present application. In this regard, a person skilled in the art would not look to or consider looking in the field of filters when solving problems in the field of convenience rolls unless the solution of the present invention was known. Thus, it is respectfully submitted that the rejections based upon Sutton have been overcome for this separate and independent reason. Favorable reconsideration is respectfully requested.

Furthermore, although Sutton teaches folding filters into quarters, Sutton expressly teaches:

... Then each succeeding filter element 30 in the stack is arranged one above the other in oppositely arranged fashion to form a generally square cross-sectional shape (as at 46 in FIG. 6). In this arrangement, the rounded edge 48 of filter element 42 overlaps the rounded edge 50 of filter element 44, and the interrelationship is such that each lower filter element may be removed from the others by being pulled through the aperture 18; at the same time, the next higher filter element moves into the position within the aperture 18 as illustrated in FIG. 5. (column 3, lines 61-70 of Sutton.)

It is respectfully submitted that it is impossible to connect the filters of Sutton along a fold line and arrange them to form a generally square cross-sectional shape as expressly taught by Sutton. Thus, it should be appreciated that the teachings of Fry and Sutton are mutually exclusive as the abrasive discs of Fry are interconnected but cannot be folded and the filters of Sutton are folded but cannot be interconnected. Thus, a person skilled in the art would not destroy the function

and purpose of both Fry and Sutton except in an attempt to recreate the present invention using hindsight knowledge. Thus, it is respectfully submitted that the rejections based upon Fry and Sutton have been overcome for this separate and independent reason. Favorable reconsideration is respectfully requested.

Similarly, and in a similar manner as Fry and Sutton, the fan shown in Dabney is itself also fundamentally different from the present invention in terms of both its nature and purpose. Dabney's product is a fan, not a convenience device. The reason for the preferred shape is to allow it to be unfolded for use as a blade or for artistic reasons and to be folded when inactive. This is nothing whatsoever like a convenience wipe in terms of either its nature or purpose when construed within the context of the specification and drawings of the present application. In this regard, a person skilled in the art would not look to or consider looking in the field of fans when solving problems in the field of convenience rolls unless the solution of the present invention was known. Thus, it is respectfully submitted that the rejections based upon Dabney have been overcome for this separate and independent reason. Favorable reconsideration is respectfully requested.

Likewise, Dabney provides no teaching or suggestion that the fans are in any way interconnected. Thus, Dabney provides no teachings or suggestions relating to the deficiencies of Fry and/or Sutton. Thus, it is respectfully submitted that the rejections based upon Dabney have been overcome for this separate and independent reason. Favorable reconsideration is respectfully requested.

Furthermore, Harsanyi provides no teaching or suggestion that the towelettes are in any way interconnected. Thus, Harsanyi provides no teachings or suggestions relating to the deficiencies of Fry, Sutton and/or Dabney. Thus, it is respectfully submitted that the rejections based upon Harsanyi have been overcome for this separate and independent reason. Favorable reconsideration is respectfully requested.

For completeness, Fry expressly teaches against the relationship of Field at column 1, lines 54-61. Thus, a person skilled in the art considering the teachings of Fry would not consider Field as against the express teachings of Fry. Thus, it is respectfully submitted that the rejections of the claims based upon Field have been overcome for this separate and independent reason. Favorable reconsideration is respectfully requested.

Therefore, since the claims of the present application have been shown to include limitations directed to the features of applicant's Convenience Rolls, which are neither shown, described, taught, nor alluded to in any of the references cited by the Examiner and by the applicants, whether those references are taken singly or in any combination, the Examiner is requested to allow claims 3, 5, 8-10, 12-14, 23-25, and 29-37, as amended, of the present application and to pass this application to issue.

In view of the foregoing remarks, it is believed that the application is now in condition for allowance and such action is respectfully requested. If any points remain in issue which the Examiner feels could best be resolved by either a personal or telephone interview, the Examiner is urged to contact Applicants' attorney at the exchange listed below.

**Respectfully Submitted,
Oday Abbosh et al.**

A handwritten signature in cursive script, appearing to read "Alan Kamrath".

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